

MICHAEL LI-MING WONG (CSBN 194130)
ROPES & GRAY LLP
One Embarcadero Center, Suite 2200
San Francisco, CA 94111
Telephone: (415) 315-6363
Facsimile: (415) 315-6001
E-mail: michael.wong@ropesgray.com

PETER M. LEVINE (NYSBN 1830884)
420 Lexington Avenue, Suite 2620
New York, New York 10170
Telephone: 212-599-0009
Facsimile: 212-838-8663
E-Mail: chief@pmlevinelaw.com

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Attorneys for Defendants
CONVERGENCE WORKS, LLC and STRATEGEMA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

PANTERRA NETWORKS, INC.,
Plaintiff,

v.

CONVERGENCE WORKS, LLC and
STRATEGEMA, LLC
Defendants.

Case No. CV-09-1759 (RMW)

**STIPULATION AND []
ORDER TO POSTPONE THE
OCTOBER 2, 2009 INITIAL CASE
MANAGEMENT CONFERENCE AND
MOTION HEARING**

The Honorable Ronald M. Whyte

This matter has been set for an Initial Case Management Conference on October 2, 2009, and a hearing on Defendants' Motion to Dismiss on November 6, 2009. The parties hereby stipulate and agree that both hearings should be rescheduled for Friday, November 13, 2009, at 9 am, to accommodate counsel for defendants.

1 Counsel for defendants is scheduled to undergo a medical procedure on October 1, 2009,
2 and therefore cannot participate in a hearing on October 2. Moreover, the defendants respectfully
3 request, to conserve the parties' and the Court's resources, that the Initial Case Management
4 Conference and the hearing on Defendants' Motion to Dismiss be held on the same day. If the
5 Court grants the Motion to Dismiss, that would obviate the need for the scheduling of discovery.
6 To the extent that the Court denies the Motion to Dismiss, the parties can then immediately
7 proceed to the Case Management Conference.
8

9 Finally, local counsel for defendants (who will argue the motion) is scheduled to be out of
10 the country on November 6, 2009. Accordingly, the parties hereby stipulate and agree that both
11 hearings be set for November 13, 2009.
12

13 Respectfully submitted,

14 Dated: September 30, 2009

SPECTOR GADON & ROSEN P.C.

15 By: /s/ Richard Gallucci
16 Richard Gallucci

17 Attorneys for Plaintiff
18 PANTERRA NETWORKS, INC.,
19

20 Dated: September 30, 2009

ROPES & GRAY LLP

21 By: /s/ Michael Li-Ming Wong
22 Michael Li-Ming Wong

23 Attorneys for Defendant
24 CONVERGENCE WORKS, LLC and
25 STRATEGEMA, LLC
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1 SO ORDERED:

Dated:

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9/30/09

3 HON. RONALD M. WHYTE
4 UNITED STATES DISTRICT JUDGE

5
6 I, Michael Li-Ming Wong, am the ECF User whose ID and password are being used to
7 file the foregoing Stipulation and Proposed Order. In compliance with General Order 45, X.B., I
8 hereby attest that Richard Gallucci has concurred in this filing.

9
10 Dated: September 30, 2009

ROPES & GRAY LLP

11
12 By: /s/ Michael Li-Ming Wong

Michael Li-Ming Wong

13 Attorneys for Defendant
14 CONVERGENCE WORKS, LLC and
15 STRATEGEMA, LLC
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